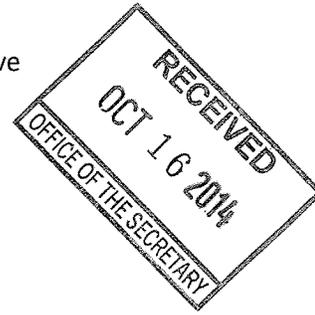


Ms. Kelly Black-White submits the following responses to the allegations set forth in the above referenced administrative proceedings.



C. "Kickback" Scheme

1. Black-White Receives a Portion of the "Kickback" Monies

A. Denied - The word "kickback" was never used in at anytime in any format. Ms. Black-White did not have any participation in stock offering.

B. Denied – Edward Henderson never described investment transaction to Ms. Black White. The word "kickback" was never used or discussed. Ms. Black-White was told the terms of the funding would only be discussed with the principals of the company. Ms Black-White did not participate in any meeting, telephone call or contracts or documents. Ms. Black-White did not negotiate any funding transactions, stock purchases or agreements.

C. Denied-Fund Manager never used the word "kickback". Fund Manager suggested that Ms. Black- White help him with Business Development. Ms. Black-White clearly states on tape that she trying to help the companies execute their business plan and is not looking for compensation from the company's or the fund manager. Ms. Black-White was introduced to Fund Manager by Paul Desjourdy on June 10th Ms. Black-White was told that she had to meet with the fund manager by Paul Desjourdy and Edward Henderson on June 13, 2011 or Symbolon would not be funded. Ms. Black-White was already scheduled for east coast trip and rearranged her schedule to meet with Fund Manager as a representative of Symbolon Board.

C. Denied - The word "kickback" was never used from the Fund Manager. According to their Website, John Kelly was the registered owner of Seafin Capital. Fund Manager required all companies to be fully reporting with the SEC/Pinksheets and knew the management would be filing disclosure with the SEC and in their Quarterly filings. The fund Manager required all transaction to remain confidential between the company and fund Manager

E. Denied - Fund Manager stated he was issuing smaller tranches until he got to know the companies and until his corporate office could verify their corporate strategies and reporting status. He specifically said if they found out they were not reporting companies he could not fund, non reporting pink sheet companies.

F. Denied - Word "kickback" never used. Details of public company transactions were not discussed with Ms. Black-White. Ms. Black-White was not part of calls, meetings, negotiations or contracts. Ms. Black-White did not discuss invoices with any company or principal Symbolon Board discussed invoices and the Board agreed no invoices would be generated. There were unnecessary and the transaction would be reported to the auditors and SEC in Quarterly filings.

G. Denied - Word "kickback" was never used.

Ms. Black-White told Fund manager she was not interested in payment and she was only interested in Symbolion having the ability to follow their business plan.

H. Denied - Ed Henderson called Ms. Black-White and requested the telephone number for the CEO of Symbolion and Microholdings to discuss possible funding.

Ed Henderson introduced the companies to the fund manager, he specifically said it was his contact and he could not have me be any part of the conversation or transaction.

Ms. Black-White did not participate in calls, meetings, negotiations, contracts or funding.

Ms. Black-White was introduced to the fund manager on June 10, 2011 by Paul Desjourdy of Symbolion by email and a letter of reference.

Symbolion was funded as early as April 2011, Ms. Black-White is unsure as the Executive Board meet privately and accepted the funding transaction.

Ms. Black-White did not find out about transaction until after May 13th board meeting.

I. Ms. Black-White introduced Albert Reda the Fund Manager by email and suggested he call Fund Manager direct. Any and all other contact with Albert Reda was between Mr. Reda and the Fund Manager.

Ms. Black-White did not have an Investors relations contract with 1st Global.

Ms. Black-White had introduced the company to a bonding agent and broker dealers for an international offering and Real Estate bond.

Ms. Black-White did not participate in telephone calls, attend meeting, negotiate terms or discuss transaction with Albert Reda or Fund Manager.

Ms. Black-White does not know Mr. Gilbreath, Ms. Black-White introduced Mr. Stephen Stuart to Edward Henderson.

Ms. Black-White had no business relationship with ComCam or Stuart or Gilbreath.

J. Denied – Ms. Black White has not knowledge of what was discussed by corporate officers and fund manager. The word Kickback was not used in any discussion.

Ms. Black-White introduced 1st Global to Paul Desjourdy for Albert Reda to meet with Mr. Desjourdy and was then introduced to the fund manager after Albert Reda meet with Edward Henderson and Paul Desjourdy.

Edward Henderson introduced other companies to fund manager and participated in meetings and telephone calls.

K. Denied- this information is unknown to Ms. Black-White

L. Denied - There was no agreement for business development payment with the Fund manager. Fund manager was told by Ms. Black-White and recorded on tapes stating Ms. Black-White did not want or expect compensation from the company or the fund manager. Ms Black-White stated to Fund Manager that she only wanted the companies to be funded.

L. Continued

Ms. Black White never expected payment nor requested payment. The Fund Manager repeatedly emailed Ms. Black-White for bank information he stated that "he did not do business without paying fees" He also stated he had to clear his books on every transaction. Ms. Black-White never provided the corporate banking information to the fund manager. When Ms. Black-White did not send invoice or send Bank information, Fund Manager called Ms. Black-Whites office manager Jennifer Collinsworth and told her he needed to send payment. Ms. Collinsworth sent the bank information to the Fund Maanger as a normal transaction. Ms Black-White was out of town and traveling with a client and unaware of the receipt of the payment. Ms Black-White had accounts and office manager to run the daily operations, as she was traveling for trade show conferences with a client for the entire month of June 2011.

2. The 1st Global Scheme

A. 1st Global's Albert Reda was introduced to Paul Desjourdy and met with him prior to meeting with Fund Manager. It is unknown what was discussed at that meeting. Ms Black-White is unaware of the word "kickback" being discussed. Albert Reda discussed with Paul Desjourdy and Gina Austin his that transaction in details. Albert Reda did not discuss the transaction detail with Ms. Black-White, as with all the company fund manager required confidentiality from companies he funded.

B. Unknown to Ms. Black-White what was discussed, she has never heard anything about a secret 50% "kickback".

C. Unknown to Ms Black -White, Ms. Black-White did not discuss the meeting with Mr. Reda, or Fund Manager. Ms Black-White did not attend meeting participate in telephone calls or contracts or negotiations.

D. It is unknown to Ms. Black-White what was discussed at the meeting. Ms. Black-White did not attend meeting or participate in any telephone call, negotiations or any financing transaction contracts.

E. Unknown to Ms Black-White as she did not participate in meetings, telephone calls, negotiations or financing transaction contracts.

F. Unknown to MS Black-White as she did not participate in meetings, telephone calls, negotiations or financing transaction contracts.

G. Unknown to Ms. Black-White as she did not have access to bank information for 1st Global was not employed by 1st Global and had not participate in negotiations contracts or financing transactions.

H. Unknown to Ms. Black-White.

I. Unknown to Ms. Black-White as she did not have access to bank information for 1st Global.

3. ComCam Scheme

A. Unknown to Ms. Black-White, Mr. Stuart was introduced to Edward Henderson and Ms. Black-White did not participate in any telephone call, set up a meeting or attend a meeting discussed anything with Mr. Stuart except kids sports.

Mr. Stuart called Ms. Black-White looking for funding she gave him Mr. Henderson telephone number as a referral.

Ms. Black-White did not ever speak with Mr. Gilbreath and does not know him.

B. Unknown to Ms. Black-White, she did not make introduction to fund manager, attend meeting, and participate in any telephone calls or negotiations of financing contracts.

C. Unknown to Ms. Black-White, as she did not make introduction to fund manager, attend meeting, participate in any telephone calls or negotiations of financing contracts.

D. Unknown to Ms. Black-White, as she did not attend meeting, she did not make introduction to fund manager, participate in any telephone calls or negotiations of financing contracts.

E. Unknown to Ms. Black-White, as she did not have relationship with ComCam, she does not know Mr. Gilbreath and was not made aware of any financing transaction that was completed. Ms. Black-White did not speak to Mr. Stuart about anything regarding ComCam.

F. Unknown to Ms. Black-White, as she did not have access to ComCam banking information and she had no relationship with the company.

G. Unknown to Ms. Black-White, as she did not have access to ComCam banking information and had not had contact with Mr. Gilbreath or Mr. Stuart.

H. Unknown to Ms. Black-White as she did not have access to ComCam Corporate information and was not in a relationship with either Mr. Gilbreath or Mr. Stuart. Ms. Black-White had no contact with either Mr. Stuart or Mr. Gilbreath.

Thank you for your consideration in my response to this complaint.

Sincerely,

Kelly Black-White